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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

JUL 17 2006

06-AMCP-0251

Ms. Jane A. Hedges
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99352

RECEIVED
JUL 24 2006
EDMC

Dear Ms. Hedges:

CALENDAR YEAR (CY) 2005 HANFORD SITE MIXED WASTE LAND DISPOSAL
RESTRICTIONS (LDR) SUMMARY REPORT (DOE/RL-2006-23) COMMENT RESPONSES

The purpose of this letter is to transmit responses (Enclosure 1) to the comments provided in the State of Washington Department of Ecology (Ecology) letter dated June 12, 2006, in accordance with the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), Action Plan, Section 9.0, Documentation and Records. The responses to Ecology's comments were agreed to at the June 26, 2006, Tri-Party Agreement Project Managers meeting with Eric Van Mason. The updated CY 2005 LDR Summary Report (DOE/RL-2006-23, Revision 0) is also being sent for your approval (Enclosure 2).

To finalize the CY 2005 LDR Summary Report, the U.S. Department of Energy, Richland Operations Office (RL) requests that Ecology sign the signature page contained in the report and return the signed page with an approval letter. In addition, RL requests Ecology document the future utility of LDR Summary Reports in the approval letter.

If there are any questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,

Keith A. Klein
Manager

AMCP:GLS

Enclosures (2)

cc: See Page 2

Ms. Jane A. Hedges
06-AMCP-0251

-2-

cc w/encls:

G. Bohnee, NPT
N. Ceto, EPA
D. Goswami, Ecology
S. Harris, CTUIR
R. Jim, YN
T. M. Martin, HAB
K. Niles, ODOE
D. G. Singleton, Ecology
E. J. Van Mason, Ecology
Administrative Record (M-026)
Environmental Portal

cc w/o encls:

J. V. Borghese, FHI
B. H. Ford, FHI
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J. D. Guberski, CH2M
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J. E. Rugg, WCH
H. T. Tilden, PNNL

REVIEW COMMENT RECORD	Date: June 27, 2006	Enclosure 1 for 06-AMCP-0251 Page: Page 1 of 3
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Document Number(s)/Title(s): Calendar Year 2005 Hanford Site Mixed Waste Land Disposal Restrictions Summary Report (DOE/RL-2006-23)	Reviewer: Eric Van Mason et. al.	Organization/Group: WADOE	Location/Phone: 509-372-7950
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Item	Page #	Ecology Comment	DOE Response	Status
1	Page 1-11 Table 1-2 Treatability Group Summary of Storage, Characterization, Treatment, and Disposal Activities Purgewater	Explain the source of numbers for Purgewater. The projected volume to be treated through 2010 seems particularly low.	The capacity of the 600 Area Purgewater Treatment and Storage Facility (TSD unit) modutank is 1,000,000 gallons = 3,785 m3. The recent estimation provided on the annual purgewater generation volume during the purgewater contained-in request discussions is 300,000 gallons/year = 1,135 m3/year. The LDR report identified 2,500 m3 on an annual basis and this number is a carry over number from year-to-year in the LDR report since the CY2002 LDR report. The year 2010 number being zero was an oversight and should have been entered as 2,500 m3 to be consistent with previous reporting. DOE proposes to make all the years' forecast 1,135m3 to be consistent with the current purgewater estimates. This number will be used in subsequent reports unless a basis otherwise exists. Table 1-1, 1-2, and 4-1 have been updated. A programming change will be implemented in the LDR database to provide a mechanism to ensure a "0" number is correct.	Closed
2	Page 1-24 Table 1-4 Potential Mixed waste Table UO ₃ facility	PMW table references DOE/RL 98-22 as identifying hazardous material remaining in the facility. DOE/RL 98/22 does not identify what material remains in the 270-W tank but states that the contents remain unknown. If available, additional information should be added to DOE/RL 98-22 or the PMW table. If the contents of 270-W are unknown a storage assessment should be scheduled.	No additional information is known about the contents of the 270-W vessel. FH believes that the vessel was used as a neutralization vessel for liquids going to the U-8 and U-12 cribs. FH will agree to add 270-W as a LDR Storage assessment as the next assessment at the end of the assessment schedule which will be a start date of 2 nd quarter CY 2007.	Closed
3	Page 3-3 Table 3-1 Summary of Characterization Information SST Waste	Under Additional characterization activities column, table states "Further information may be required" Please provide further explanation.	The phrase ", per TPA milestone.", will be added to end of both the SST Waste and DST Waste treatability group entries in 2nd column.	Closed

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4	Page 5-1 Table 5-1 Storage Volume and Number of Containers for Selected Hanford Locations CWC	Is classified waste stored at CWC captured within the volumes listed?	Classified TRUM and/or MLLW packages residing at the CWC are included in the volumes and container counts provided in the LDR report. No report changes are proposed.	Closed
5	Table 1-1, p. 1-5, 222-S Laboratory Complex Generation projection 2010 (m ³)	Shows 1 m ³ , rather than 11 in years following. If assumption is made that WTP Lab will be operational by 2010 and need for 222-S will disappear, assumption does not recognize delay in construction/hot start of WTP. Not clear that RL and ORP are integrating planning for use of 222-S.	It appears the difference was an oversight and 11m ³ should be the forecasted amount for all five years. The 222-S Laboratory treatability group consists of two location specific data sheets (LSDS). One LSDS describes the waste managed through 616 that is sent for storage at 222-S (1m ³ is forecasted for each year). The second LSDS is waste generated within the 222-S Laboratory (10m ³ is forecasted for each year except 2010). DOE is proposing a change to add the 10m ³ into the 2010 year for the 222-S LSDS to make them all consistent at 11m ³ . Table 1-1, 1-2, and 4-1 have been updated. A programming change will be implemented in the LDR database to provide a mechanism to ensure a "0" number is correct.	Closed
6	Sec. 1.2. ¶ 1, sentence 2 Mixed waste managed... are not reported.	TYPO – change are to is.	Word will be changed.	Closed
7	Table 1-1, p. 1-8, Purgewater Generation projection for 2010	The table does not contain volumes of purgewater that will be generated in 2010. By implication, either sampling efforts will be suspended or purgewater will be collected and taken directly to PSTF or ETF for treatment (Table 1-2). Please clarify the process to treat purgewater after 2009.	See comment response #1.	Closed
8	Table 1-2 Title "Treatability Group...and Disposal Activities	Title is not accurate. Disposal Activities not included in information. While LDR implies land disposal, paths for individual units are not included.	The title of Table 1-2 will be changed to "Treatability Group Summary of Storage, Characterization, and Treatment, Activities."	Closed

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9	Table 1-4, p. 1-16, 241-Z Heels, associated piping, line flushing and sludge cleanout.	Schedule information states waste to be dispositioned as CERCLA non-time critical removal action, with 241-Z facility transition and dismantlement due by September 30, 2011. FY07 budget request states that dismantlement/demolition of the 241-Z facility will be complete by the end of FY07 (DOE/CF-006, Vol. 5, p. 246). From the information provided, the waste from that dismantlement would appear to be non-mixed in large part. Please confirm.	At this time, the majority of the matrices are mixed waste. The project currently estimates that the mixed waste to non-mixed waste ratio of the matrices identified in the potential mixed waste table is approximately 60:40.	Closed
10	Table 1-4, p. 1-16, 241-Z-361 Tank containing waste from past practices	Text states that a data gap plan is scheduled for 1 st Qtr 2007 and remediation is scheduled for 2009 to 2011. That information would appear to be outdated, based on the DOE/CF-006, Vol 5 information, if the USDOE RL intends to complete 241-Z D4 in FY07.	The schedule information for closure of the TSD unit tank D4 under the 241-Z Treatment and Storage Tanks approved RCRA closure plan does not relate to the schedule for remediation of the 241-Z-361 settling tank. See the RCRA Part A for the 241-Z Treatment and Storage Tanks to show the scope of the closure.	Closed
11	Table 1-4, various locations See the location-specific data sheets for details regarding waste.	Data sheets are not transmitted with the summary. Needs clarification.	Text regarding data sheets will be modified in Tables 1-4 and 1-5 where those words appear (Table 1-4: B-Plant and PUREX. Table 1-5: 100-N Lead Storage Area, PFP/234-5Z, Waste Handling Facility/219-S, 100-K Basins/105-KW, 100-D/DR Reactor Facility, 100-F Reactor Facility, and 100-H Reactor Facility) since the CY2005 LDR Summary Report does not include the data sheets.	Closed
12	General Comment	The 241-U-361 settling tank is not included in the report. If the waste in this tank is not intended for direct disposal at ERDF, it should be included in the report.	Information about this tank is included in two locations in the LDR report. The first location is in Table 1-4, Potential Mixed Waste Table under "IMUSTs not associated with a building". The second location is in Table 2-2 where an LDR storage assessment will be started 2 nd quarter CY2006. No text changes are proposed.	Closed